

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW**

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**DISH NETWORK LLC**

**Plaintiff**

**Vs.**

**CIVIL ACTION NO. 18cv3857**

**VERIFIED ANSWER TO  
PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

**GOYAL GROUP INC. and CHANDRA GOYAL  
D/b/a Goyal Group, RANA TECHNOLOGY INC., and  
MOHAMMAD RANA d/b/a Family Phone, ABC1 NYC INC.  
RS NYC1, INC. ABC WIRELESS 2 INC. NEARAJ BHALLA,  
LOMANATHANG, INC.,  
And SONAM SANGPO d/b/a ABC Wireless NYC,  
Defendants**

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Please take the notice that the Defendant **RANA TECHNOLOGY INC., and  
MOHAMMAD RANA d/b/a Family Phone** hereby appears through his attorney  
**Madhureema Gupta** for his answer to the complaint:

**PARTIES**

1. Defendant states that the defendant lacks knowledge or information sufficient to form a belief as to the truth of the paragraphs 1 of the complaint.
2. Defendant admits paragraph 2 of the complaint.
3. Defendant states that the defendant lacks knowledge or information sufficient to form a belief as to the truth of the paragraphs 3 of the complaint.

**PARTIES**

4. Defendant states that the defendant lacks knowledge or information sufficient to form a belief as to the truth of the paragraphs 4 of the complaint.
5. Defendant states that the defendant lacks knowledge or information sufficient to form a belief as to the truth of the paragraphs 5, 6, and 7 of the complaint.

6. The Defendant admits in part and denies in part paragraph 8 of the complaint. Defendant's corporation **RANA TECHNOLOGY INC.**, d/b/a Family Phone is closed since June 2018.

7. The Defendant admits in part and denies in part. The defendant Mr. Rand does not reside at 83-42 159 Street, Jamaica, and NY 11432. Mr. Rana was chief executives officer, president and owner of Rana Technology. But since June 2018 Rana Technology d/b/a Family phone is closed. The defendant denies alleged allegation in last line of paragraph 9 of the complaint.

10. The Defendant denies paragraph 10 of the complaint.

11. Defendant states that the defendant lacks knowledge or information sufficient to form a belief as to the truth of the paragraphs 11, 12, and 13 ,14,15,16, and 17 the complaint

#### **NATURE OF THE ACTION**

12. The Defendant denies paragraphs 18 and 19 of the complaint.

#### **DISH'S COPYRIGHTS**

13. Defendant states that the defendant lacks knowledge or information sufficient to form a belief as to the truth of the paragraphs 20, 21, and 22 of the complaint.

#### **DEFENDANT'S CONTRIBUTORY COPYRIGHT INFRINGEMENT**

14. The Defendant denies paragraph 23 of the complaint.

15. Defendant states that the defendant lacks knowledge or information sufficient to form a belief as to the truth of the paragraphs 24 and 25 of the complaint.

16. The defendant denies paragraph 26 of the complaint. The defendant did not sell and distribute Shava TV set up boxes. The defendant admit Para 26 of the complaint only to the extent that the defendant renewed one year service plan of Shava customers,

because there were no Dish Network channels in Sava Renewals. The defendant had no knowledge that Shava have any connection with dish network channel.

17. Defendant states that the defendant lacks knowledge or information sufficient to form a belief as to the truth of the paragraphs 27,28,29,30, and 31 of the complaint.
18. The Defendant denies alleged allegations in paragraph 32 of the complaint.
19. Defendant states that the defendant lacks knowledge or information sufficient to form a belief as to the truth of the paragraph 33 and 34 of the complaint.
20. The denies alleged allegations in paragraph 35 and 36 of the complaint.
21. Defendant states that the defendant lacks knowledge or information sufficient to form a belief as to the truth of the paragraph 37 of the complaint.

### **COUNT 1**

#### **Contributory Copyright Infringement under 17 USC sections 501**

22. The defendant repeats the answer in paragraphs 1-37 in response to Para 34 of the complaint.
23. Defendant states that the defendant lacks knowledge or information sufficient to form a belief as to the truth of the paragraphs 39 and 40, 41and 42 of the complaint.
24. The defendant denies paragraphs 43,44,45,46, and 47 of the complaint.

#### **First Affirmative Defense**

25. The complaint fails to state a cause of action.

#### **Second Affirmative Defense**

26. Defendant has no knowledge that that Shava TV Set top box or service had programming that compromises the protected channel.

**Third Affirmative Defense**

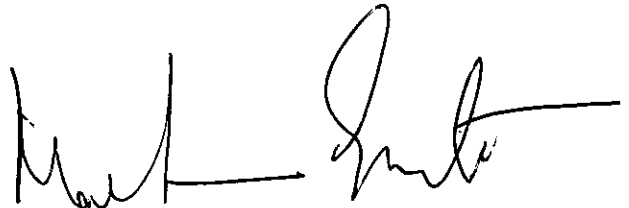
27.. The defendant had no knowledge that Shava have any connection with dish network channels in any way.

**PRAYER FOR RELIEF**

WHEREFORE, defendant demands judgment against plaintiff as follows:

- a. dismissing the first amended complaint with prejudice;
- b. Costs and disbursements of this action;
- c. such other and further relief as to the Court deems proper.

Dated: March 9, 2018  
Queens, New York



**MADHUREEMA GUPTA, ESQ.  
ATTORNEY FOR THE DEFENDANTS  
RANA TECHNOLOGY INC., and  
MOHAMMAD RANA d/b/a Family Phone  
37-11 74 Street, Suite 201,  
Jackson Hts, NY 11377  
Tel: 917-842-2246  
Fax: 718-478-6579**

To  
Plaintiff Attorneys

James T. Sanders  
Skarzynski, Black, LLC  
One Battery Plaza, 32<sup>nd</sup> floor,  
New York, NY 10004  
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Stephen M. Ferguson  
Hagan Noll & Boyle. LLC  
Two memorial City Plaza  
820 Gessner, Suite 940  
Houston, TX 77024  
Telephone # 713-343-0478  
Fax# 718-758-0146

VERIFICATION

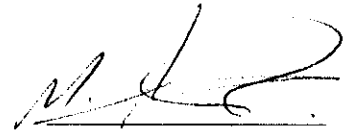
STATE OF NEW YORK

COUNTY OF QUEENS

}  
} ss:

**MOHAMMAD RANA, being** duly sworn, deposes and says:

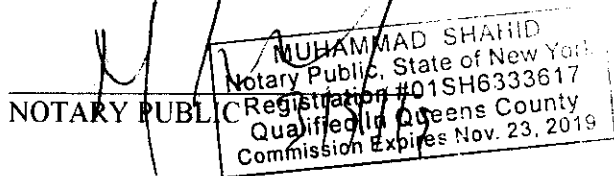
I am the defendant in the within action. I have read the foregoing Verified Answer to the amended complaint, and I know the contents of the same to be true to my own knowledge, except as to the matters stated therein to be alleged upon information and belief, and as to those matters, I believe them to be true.



**MOHAMMAD RANA**

Sworn to before me  
This 9<sup>TH</sup> day of March, 2019

NOTARY PUBLIC



VERIFICATION

STATE OF NEW YORK

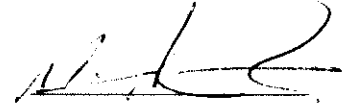
COUNTY OF QUEENS

}  
} ss:  
}

**MOHAMMAD RANA, President of Rana Technology Inc.** being duly sworn, deposes  
and says:

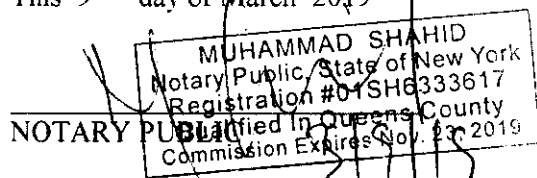
I am the defendant in the within action. I have read the foregoing Verified Answer to the amended complaint, and I know the contents of the same to be true to my own knowledge, except as to the matters stated therein to be alleged upon information and belief, and as to those matters, I believe them to be true.

RANA TECHNOLOGY, INC.



**MOHAMMAD RANA, PRESIDENT**

Sworn to before me  
This 9<sup>TH</sup> day of March 2019



UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW

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DISH NETWORK LLC

Plaintiff

CIVIL ACTION NO. 18cv3857

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MOHAMMAD RANA d/b/a Family Phone, ABC1 NYC INC.  
RS NYC1, INC. ABC WIRELESS 2 INC. NEARAJ BHALLA,  
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Defendants

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VERIFIED ANSWER TO PLAINTIFF'S FIRST AMENDED COMPLAINT

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To the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of these papers or the contentions therein are not frivolous as defined in subsection (c) of section 130-1.1 of Rules of the Chief Administrator (22NYCRR).



MADHUREEMA GUPTA, ESQ.

ATTORNEY FOR THE DEFENDANTS

RANA TECHNOLOGY INC., and  
MOHAMMAD RANA d/b/a Family Phone

37-11 74 Street, Suite 201,

Jackson Hts, NY 11377

Tel: 917-842-2246

Fax: 718-478-6579

To: \_\_\_\_\_  
Service of a copy of the within \_\_\_\_\_ is hereby admitted.  
Dated: \_\_\_\_\_

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NOTICE OF SETTLEMENT

IS NOTICE OF SETTLEMENT IS PART OF THE LITIGATION BAG WHICH TO BE FILED IN COURT)

PLEASE TAKE NOTICE

That the within is a (certified) true copy of a  
Entered in the office of the clerk of the within named court on  
That an Order of which the within is a true copy will be presented for settlement to  
the Hon.